

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTWAIN BAILEY,)	
)	
Plaintiff,)	08 C 4441
)	
vs.)	Honorable Judge
)	George Marovich
CITY OF CHICAGO, ILLINOIS,)	
CHICAGO POLICE OFFICERS)	
D.W. PEARSON, Star no. 16462,)	
K.K. KRIZKA, Star No. 15972, and)	
R. BROWN, Star No. 12748,)	
COUNTY OF COOK, UNKNOWN)	
COOK COUNTY SHERIFFS, and)	
UNKNOWN MEIDCAL PERSONNEL)	
OF COOK COUNTY HOSPITAL, (Stroger),)	
)	
Defendants.)	

**MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant County of Cook through its attorney RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, Assistant State's Attorney KEVIN FREY, and, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (FRCP), state as follows:

1. That the Defendant in this matter is represented by the Office of the Cook County State's Attorney.
2. That the Office of the Cook County State's Attorney has just received the case, and the undersigned attorney will file an appearance instanter.
3. The undersigned immediately ordered all CCDOC records for the plaintiff that may be germane to Plaintiffs' claims. These are expected to be voluminous, and will take a great deal of time to assemble due to the wide range of allegations

involved in the Complaint.

4. That once the undersigned attorney is in receipt of all relevant jail and medical records regarding the incident(s) alleged in the complaint, he will have to determine whether an answer or dispositive motion should be filed on behalf of the defendant, and subsequently served defendants. If an answer is to be filed, the undersigned must meet with all served defendants to prepare their answers and determine whether any conflict in representation exists.
5. The undersigned attorney is not being dilatory in bringing this motion, and apologizes to this Honorable Court for any inconvenience that this extension may cause.
6. That undersigned attorney respectfully requests 45 days to prepare an appropriate answer or other pleading on behalf of said defendants.

WHEREFORE, the defendant respectfully requests that this Honorable Court vacate any defaults, technical or otherwise that may have been entered, and grant an extension of time until October 31, 2008, to move, answer or otherwise plead in this matter.

Respectfully Submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

By: /s/ Kevin Frey
Kevin Frey
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